

# Inner City Press

January 5, 2023

By ECF

Hon. Sidney H. Stein, United States District Judge  
Southern District of New York, 500 Pearl Street, New York, NY 10007

Re: Press brief reply on public access to sentencing memo and exhibit in US v. Jennifer Shah, 19-cr-833 (SHS)

Dear Judge Stein:

This replies to defense counsel's argument that the sentencing materials submitted for the Court's consideration can be withdrawn. But they are judicial documents. And citing to pre-guilty plea rulings on motions in limine is unavailing.

Most offensive is the claim that Exhibit D, the defendant's own statement asking for a substantially below Guidelines sentence, has been redacted in conformity to rules and precedent. It has not.

The second paragraph starts, "In 2016, my life hit a serious crossroad" - then three lines are redacted. The third paragraph begins with a sentence about the defendant's husband - then a full page is redacted.

This is unheard of. Contrast it to the January 4, 2023 resentencing of Raymond Quiles, who cooperated with the government about and was ready to testify against this defendant. The courtroom was not sealed; his arguments for mercy, about his autistic son (whose name was given) and his floundering business were all public.

Why should Jen Shah be given substantially more secrecy than Raymond Quiles?

This statement, intended to procure a lighter sentence, cannot be withdrawn and must be unredacted. Thank you for consideration.

Respectfully submitted,

/s/

Matthew Russell Lee, Inner City Press

cc: counsel via ECF

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